

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,))
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES))
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al,)

Defendants.)

THE VIDEOTAPED 30(b)(6)

DEPOSITION OF READ HUDSON, produced as a witness
on behalf of the Plaintiff in the above styled and
numbered cause, taken on the 20th day of August,
2007, in the City of Fayetteville, County of
Washington, State of Arkansas, before me, Lisa A.
Steinmeyer, a Certified Shorthand Reporter, duly
certified under and by virtue of the laws of the
State of Oklahoma.

TULSA FREELANCE REPORTERS
918-587-2878

EXHIBIT

9

1 Q Richard Bond is in fact the father of Michael
2 Bond sitting here today; is that correct?

3 A Yes.

4 Q Based on the corporate structure, so that the
5 Record is clear, the Tyson Foods, Inc., owns 100
6 percent of Tyson Chicken; correct?

09:46AM

7 A Correct.

8 Q Tyson Poultry, Inc.; correct?

9 A Yes.

10 Q Cobb-Vantress, Inc.; correct?

09:46AM

11 A Yes.

12 Q What is the company referred to as Poultry
13 Growers, Inc.?

14 A It's not on there. It's -- it goes way back.
15 I mean ultimately -- I'm -- I think it's been merged
16 up into Tyson Foods.

09:46AM

17 Q What did it do?

18 A It preceded me. I really don't know.

19 Q Do you know what kind of activity it
20 performed?

09:47AM

21 A No, sir, I don't.

22 Q Are there any affiliates connected to Tyson
23 Foods, Inc., that's not listed in these charts?

24 A Help me with what you mean by the term
25 affiliates.

09:47AM

TULSA FREELANCE REPORTERS
918-587-2878

1 later.

2 Q For purposes of control in the Tyson entities,
3 does Cobb-Vantress take direction, if you will, from
4 Tyson Food, Inc.?

5 A Yes. 10:24AM

6 Q And the other entities, Tyson Chicken, does it
7 likewise take direction from Tyson Food, Inc.?

8 A Yes.

9 Q And Tyson Poultry, Inc., does it take
10 direction from Tyson Food, Inc.? 10:24AM

11 A Yes.

12 Q Do each of these entities own birds for
13 purposes of production or is that confined to a
14 single entity that might own the bird?

15 A Which entities are you talking about? 10:24AM

16 Q The ones we just talked about. Let me ask it
17 this way: Does Tyson Food, Inc., own birds?

18 A No.

19 Q Does Tyson Chicken, Inc., own birds?

20 A Yes. 10:25AM

21 Q And Tyson Poultry, Inc., does it own birds?

22 A Yes.

23 Q And does Cobb-Vantress own birds?

24 A Yes.

25 Q And those birds would be associated with their 10:25AM

TULSA FREELANCE REPORTERS
918-587-2878